

MONSANTO

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September 28, 2000

MONSANTO COMPANY
AGRICULTURAL CENTER
P.O. Box 174
LULING, LOUISIANA 70070
PHONE: (504) 785-8211

VIA FEDERAL EXPRESS

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

RE: National Environmental Achievement Track Application Submittal
Monsanto Company
Luling, LA

Monsanto Company operates an integrated chemical manufacturing facility in Luling, LA. The facility's products include Roundup® herbicide, Acetaminophen analgesic, and ACL® water treatment chemical. Properly protecting the environmental is a top tier value in our manufacturing operations at Luling. Accordingly, we are pleased to submit the enclosed application for your consideration for charter membership in EPA's National Environmental Achievement Track.

In completing this application, we have selected four (rather than the required two) previous environmental aspect improvements. These improvements are significant not only due to their size, but also because they are all the result of an innovative, new process technology for a key manufacturing process initiated at Luling in late December 1998. In the nearly two years that we have operated this facility, we have found that it has surpassed our expectations in improving these (and other) environmental aspects. Furthermore, we believe opportunities exist to further enhance these improvements and are diligently pursuing them.

While we could include these further enhancements as our commitments to future improvements, we have decided at this time to select four other items which are unrelated to this process. We believe that this approach illustrates that top environmental performance is widely valued at our facility, rather than being limited to one operating unit. The four environmental aspect improvements that we have selected for the application are:

- Revising caustic dilution system – This project will reduce water used for this purpose by about 50%; at current rates this translates to a reduction of about 38,000,000 gallons per year.
- Revising wastewater pH control system – This project will reduce caustic used for this purpose by about 14%; at current rates this translates to a reduction of nearly 1,000,000 lbs per year.

National Environmental Achievement Track Application

Monsanto Company – Luling, LA

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- Optimizing reactor operations in one of our processes – This project will reduce usage of raw materials by 0.7%; at current rates this translates to a reduction of about 2,000,000 lbs per year.

Beneficially applying waste solids generated in our biological wastewater treatment system to land onsite – At current rates, this project will eliminate the off-site disposal of solid waste by about 2,000 dry tons per year.

In addition to the application, we are enclosing a completed “Environmental Requirements Checklist”, and a supplemental information document. The purpose of this latter document is to illustrate the breadth and depth of our commitment to environmental performance at the Luling Plant.

In closing, let me reiterate what a pleasure it is to have an opportunity to participate in a program of this nature. I applaud EPA for developing a program designed to reward the top performing organizations. Furthermore, I think this program is significant in that it shows that EPA and industry can effectively work together to meet our common goal of preserving and protecting our environmental resources. Thank you for your consideration of our application, and we look forward to learning of the National Environmental Stewardship Track as it is developed.

Sincerely,



Ron Cooley
Plant Manager

cc: Mr. Hugh Finklea, LDEQ
Ms. Mary desBordes, St. Charles Parish Library
Mr. Tab Troxler, St. Charles Parish LEPC

A06-0012



*National
Environmental
Achievement Track*

Application Form

Monsanto Company - Luling, LA Facility

Name of facility

Monsanto Company

Name of parent company (if any)

12501 River Road

Street address (continued)

Luling, LA 70070

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name William C. Rhodes, P.E.

Manufacturing Technologist

(504) 785-3866

Fax (504) 785-3346

E-mail william.c.rhodes@monsanto.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

We manufacture Roundup® herbicide, Acetaminophen analgesic, and ACL® water treatment chemical

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2869 2879 2819

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50
☐ 50-99
☐ 100-499
☒ 500-1,000
☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

LAD001700756; LAD985170851

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Please refer to the attached Environmental Requirements Checklist for this information.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Yes. Please refer to the attached document entitled "Supplemental Information to National Achievement Track Application Monsanto Company - Luling, LA"

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

- 1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

b. Planning

c. Implementation and operation

d. Checking and corrective action

e. Management review

- 2 Have you completed at least one EMS cycle (plan-do-check-act)?

- 3 Did this cycle include both an EMS and a compliance audit?

- 4 Have you completed an objective self-assessment or third-party assessment of your EMS?

If yes, what method of EMS assessment did you use?

☒ Yes

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

A variety of onsite self-audits

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Monsanto corporate audit using modified A.D. Little auditing protocols

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
|--|--|-------------------------|----------------------------|-------------------------|
| | Quantity | Units BTU/lb Production | Quantity | Units BTU/lb Production |
| Energy Use - Glyphosate Production | 11,218 | | 7,340 | |
| <p>i. How is the current level an improvement over the previous level?</p> <p>This represents a reduction of 3,878 BTU/lb Production, or an improvement of 35% in this operating unit. At current rates this yields a reduction of about 300,000 Million BTU/yr.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We achieved this improvement through a revised manufacturing process technology.</p> | | | | |

Second aspect you've selected

| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
|--|--|-----------------------------------|----------------------------|-----------------------------------|
| Water Use | Quantity 4.11 | Units gallons/lb Production | Quantity 1.41 | Units gallons/lb Production |
| <p>i. How is the current level an improvement over the previous level?</p> <p>This represents a reduction of 2.7 gallons/lb Production, or an improvement of 66% in this operating unit. At current rates this yields a reduction of about 200,000,000 gallons/yr.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We achieved this improvement through a revised manufacturing process technology.</p> | | | | |

Third aspect you've selected

| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
|---|--|---------------------------------|----------------------------|---------------------------------|
| Emissions of NOx - Glyphosate Production | Quantity 0.55 | Units tons/Mlb Production | Quantity 0.36 | Units tons/Mlb Production |
| <p>i. How is the current level an improvement over the previous level?</p> <p>This represents a reduction of 0.19 tons/Mlb Production, or an improvement of 35% in this operating unit. (Please note that Mlb = Million lbs). At current rates this yields a reduction of about 14 tons/yr.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We achieved this improvement through a revised manufacturing process technology.</p> | | | | |

Fourth aspect you've selected

| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
|---|--|----------------------------------|----------------------------|----------------------------------|
| Emissions of Greenhouse Gases | Quantity 712 | Units tons/Mlbs Production | Quantity 466 | Units tons/Mlbs Production |
| <p>i. How is the current level an improvement over the previous level?</p> <p>This represents a reduction of 246 tons/Mlbs Production, or an improvement of 35% in this operating unit. At current rates this yields a reduction of about 19,000 tons/yr.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We achieved this improvement through a revised manufacturing process technology.</p> | | | | |

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Water Use
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output 0.338 gallons/lb NaOH (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value
(Quantity/Units)
- ☒ Option B:
In terms of
units of production
or output
0.175 gallons/lb NaOH
(Quantity/Units)

e. How will you achieve this improvement?

We receive NaOH at a concentration of 50% and dilute it to 21% for use in one of our manufacturing processes. We will make modifications which will allow us to increase this concentration to 30%, thus decreasing the amount of dilution water required.

Second aspect you've selected

a. What is the aspect?

Hazardous Materials Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value
(Quantity/Units)
- ☒ Option B:
In terms of
units of production
or output
10,195 lbs NaOH/Mgal
Biosystem Feed
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value
(Quantity/Units)
- ☒ Option B:
In terms of
units of production
or output
1,402 lbs NaOH/Mgal
Biosystem Feed
(Quantity/Units)

e. How will you achieve this improvement?

We will achieve this improvement through a modification to our pH control system in our biological wastewater treatment facility.

Third aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

e. How will you achieve this improvement?

Total Materials Use

☒ Yes ☐ No

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

0.632 lbs raw material/lb
DSIDA Produced
(Quantity/Units)

☐ Option A:
Absolute value

(Quantity/Units)

☒ Option B:
In terms of
units of production
or output

0.0045 lbs raw material/lb
DSIDA Produced
(Quantity/Units)

We will achieve this improvement through process optimizations.

Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

e. How will you achieve this improvement?

Total Solid Waste

☒ Yes ☐ No

☒ Option A:
Absolute value

2,000 dry tons biosolids/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

☒ Option A:
Absolute value

2,000 dry tons biosolids/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

We will achieve this improvement by beneficially applying our biological wastewater treatment facility's waste solids to land onsite, rather than shipping it off-site for landfarm disposal.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

Please refer to the attached document entitled "Supplemental Information to National Achievement Track Application Monsanto Company - Luling, LA" for this information.

2 How do you inform community members of important matters that affect them?

Please refer to the attached document entitled "Supplemental Information to National Achievement Track Application Monsanto Company - Luling, LA" for this information.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☐ Website www.
- ☐ Newspaper
- ☐ Open Houses
- ☒ Other

We will share this information with our Community Advisory Panel, and will evaluate further publicity means in the future.

4 Are there any ongoing citizen suits against your facility?

☒ Yes

☐ No

If yes, describe briefly in the right-hand column.

A class action lawsuit has been filed pertaining to a release of acetic acid / acetic anhydride on May 4, 2000.

5 List references below

| | Organization | Name | Phone number |
|---|---|--------------------|----------------|
| <i>Representative of a Community/ Citizen Group</i> | St. Charles Parish Library, Director | Ms. Mary desBordes | (504) 785-8464 |
| <i>State/Local Regulator</i> | LDEQ, Louisiana Environmental Leadership Program Director | Mr. Hugh Finklea | 225-927-0816 |
| <i>Other community/local reference</i> | St. Charles Parish Department of Emergency Preparedness (LEPC), Director | Mr. Tab Troxler | (504) 783-5050 |

Section E

Application and Participation Statement.

On behalf of Monsanto Company Luling, LA
[my facility],

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Ron C. Cooley 9/28/00

Printed Name/Title Mr. Ron C. Cooley, Plant Manager

Facility Name Monsanto Company, Luling, LA

Facility Street Address 12501 River Road; Luling, LA 70070

Facility ID Numbers LAD001700756; LAD985170851

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Monsanto Company
Facility Location: Luling, LA
Facility ID Number(s): LAD001700756, LAD985170851
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☒
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☒
5. Process Industry Emission Standards ☒
6. Control of Fuel Burning Equipment ☒
7. Control of VOCs ☒
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☒
10. Control of Fugitive Dust ☐
11. Toxic Air Pollutants Control ☒
12. Vehicle Emissions Inspections and Testing ☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. Chemical Accident Prevention Provisions (40 CFR 68) ☒
14. Stratospheric Ozone Protection (40 CFR 82) ☒

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste ☒
 - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting ☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8.
- 9.

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. LA State Police Emergency Response Commission ☒
- 7. LA Dept. of Health and Hospitals R.S. 30:2273 ☒

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☒
- 2. Permit Requirements for Solid Waste Disposal Facilities ☒
- 3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☒
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☒
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☒
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. Pesticide Chemicals Effluent Guidelines and Standards (40 CFR 455) ☒
18. Pharmaceutical Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 439) ☒

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☒
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐

5. Underground Injection Control Requirements
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. LA Department of Natural Resources (LAC 43:XVII) ☒
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
2. Import and Export of Chemicals (40 CFR 707) ☒
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒
4. Chemical Information Rules (40 CFR 712) ☒
5. Health and Safety Data Reporting (40 CFR 716) ☒
6. Pre-Manufacture Notifications (40 CFR 720) ☒
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☒
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☒
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☒
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. Pesticide Registration and Classification Procedures (40 CFR 157)
10. Registration of Pesticide and Active Ingredient Producing Establishments (40 CFR 167)

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

2. RCRA Corrective Action (identify)
RCRA Permit LAD000170756PCO1
RCRA Permit LAD000170756PC02



**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.
4.